

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

PRUDENTIAL DEFENSE SOLUTIONS, INC.,

Plaintiff,

v.

Case No. 20-11785

JAKE W. GRAHAM, MARK SHEAHAN,
and ROBERT CHARNOT

Defendants.

**ORDER DIRECTING PLAINTIFF TO SUBMIT WITNESS LIST, EXHIBIT LIST,
DIGITAL EXHIBITS, AND PROPOSED FINDINGS OF FACT**

Plaintiff Prudential Defense Solutions, Inc., brings this action under the Michigan Uniform Trade Secrets Act ("MUTSA"), Mich. Comp. Laws § 445.1904, the federal Defend Trade Secrets Act ("DTSA"), 18 U.S.C. § 1836(b)(1), breach of contract, breach of fiduciary duty, and civil conspiracy. (ECF No. 15, PageID.247-60.) It alleges Defendant Jake W. Graham was Plaintiff's Vice President and signed a non-compete agreement but worked with Defendants Mark Sheahan and Robert Charnot, two non-employees, to establish a competing company. Defendants also allegedly misappropriated Plaintiff's proprietary information to use in their competing business.

Plaintiff has asked the court to enjoin Defendants from engaging in competition, including by soliciting Plaintiff's current or prospective clients. (ECF No. 18, PageID.516-17; ECF No. 2.) On December 16, 2020, the court will hold a hearing on the request for an injunction. (ECF No. 29.)

In preparation for the hearing, the court will direct Plaintiff to file a witness list, exhibit list, and digital exhibits; the court will direct Plaintiff to lodge with chambers proposed findings of facts. After reviewing Plaintiff's submissions, the court will decide whether a telephonic conference in advance of the hearing is necessary. Accordingly,

IT IS ORDERED that Plaintiff is DIRECTED to file a list of intended witnesses by **December 14, 2020**. Plaintiff must include the expected time needed for each witness.

IT IS FURTHER ORDERED that Plaintiff is DIRECTED to file a list of physical and digital exhibits by **December 14, 2020**. Plaintiff is also DIRECTED to file the digital exhibits it intends to use by **December 14, 2020**.

Finally, IT IS ORDERED that Plaintiff is DIRECTED to email the court's case manager, at Lisa.Wagner@mied.uscourts.gov, copying opposing counsel, a statement setting out Plaintiff's proposed findings of fact by **December 14, 2020**. The statement must include numbered paragraphs describing each material proposed fact. The court contemplates that each proposed finding of fact will be set forth concisely and separately, presented without unnecessary argumentation.

s/Robert H. Cleland /
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: December 10, 2020

I hereby certify that a copy of the foregoing document was mailed to counsel of record on this date, December 10, 2020, by electronic and/or ordinary mail.

s/Lisa Wagner /
Case Manager and Deputy Clerk
(810) 292-6522